

THE LAMBOS FIRM, LLP

C. PETER LAMBOS (1926-2003)
DONATO CARUSO
WILLIAM M. SPELMAN
NICHOLAS G. MAGLARAS (1951-2006)
CAROL NOTIAS LAMBOS* ^ + ■
PETER C. LAMBOS (1954-1991)

ANN MARIE FLYNN
RICHARD J. CIAMPI, JR.*
JAMES R. CAMPBELL*
IAN A. WEINBERGER *

ALSO ADMITTED IN: *NJ ^DC +FL ■CT

ATTORNEYS AT LAW

303 SOUTH BROADWAY ■ SUITE 410
TARRYTOWN, NY 10591

212.381.9700 ■ 212.943.2470
FAX: 212.797.9213

NEW YORK CITY
39 BROADWAY
SUITE 1620
NEW YORK, NY 10006

NEW JERSEY
599 AVENUE C
BAYONNE, NJ 07002

201.823.1000
FAX: 201.823.3097

WWW.LAMBOSFIRM.COM

January 16, 2015

VIA ECF

Honorable Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: American Stevedoring, Inc. v. International Longshoremen's Ass'n, AFL-CIO
Civil Action No.: 1:13-CV-00918 (KPF)

Dear Judge Failla:

We write in connection with the Court's December 31, 2014 Order (Docket # 101), which granted the parties additional time until January 16, 2015, in which to finalize settlement documents. The parties believe that they are very close to concluding this matter, but they have run into a glitch in respect to the terms of the final agreement which has required additional drafts and discussions. Since the Court has ordered that no further extensions will be granted, the litigation will resume. However, the parties request that mediation with Mediator Daniel F. Kolb, Esq. continue to enable the parties to reach a final resolution.

Respectfully submitted,

THE LAMBOS FIRM, LLP

By: 

Donato Caruso

Ian A. Weinberger

303 South Broadway, Suite 410

Tarrytown, New York 10591

Tel. (212) 943-2470

Fax (212) 797-9213

Honorable Katherine Polk Failla

- 2 -

January 16, 2015

cc: Michael S. Hiller, Esq. (via ECF)
Kevin Marrinan, Esq. (via ECF)
Joy M. Holz, Esq. (via ECF)
Stephen Davis, Esq. (via ECF)
Elizabeth Kozlowski, Esq. (via ECF)
Steven Schaffer, Esq. (via ECF)
Daniel F. Kolb, Esq. (via e-mail)

A0031743